## MEMORANDUM ENDORSED

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July 21, 2023

## Via CM/ECF

Hon. Gregory H. Woods United States District Court Southern District of New York 500 Pearl Street New York, New York 10007 USDC SDNY
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Re: Chicago Bridge & Iron Company N.V. et al. v. Refinería de Cartagena S.A.S.,

Case No. 1:23-cv-04825-GHW - Joint Request for Extension of Time and

Establishment of Deadlines

## Dear Judge Woods:

King & Spalding LLP represents Respondent Refinería de Cartagena S.A.S. ("Reficar"). I write now, jointly with counsel for Petitioners, in the above-referenced action to request that the Court enter the attached proposed order which slightly modifies certain deadlines established by the Court and would establish further deadlines to allow for an orderly resolution of this proceeding related to an international arbitration award issued last month.

Specifically, the Parties propose as follows:

Event	Current Deadline	Proposed Deadline
Reficar to file Response to Petitioners' Petition to Vacate and Reficar's Cross-Petition to Confirm	July 27, 2023 (response); none (petition to confirm)	August 4, 2023
Petitioners to file Reply in Support of Petition to Vacate and Opposition to Cross-Petition to Confirm	August 17, 2023 (reply); none (opposition to Cross-Petition)	August 31, 2023
Reficar to file Reply in Support of Cross-Petition to Confirm	None	September 22, 2023

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This is the parties' first request for an extension of time, it is being made jointly, and it made following discussions between counsel regarding the most efficient way to proceed with resolution of the Petition to Vacate as well as Reficar's forthcoming Cross-Petition to Confirm Arbitration Award.

Respectfully submitted,

/s/ Mike Stenglein
Mike Stenglein
Counsel for Respondent

/s/ Stephen B. Shapiro Stephen B. Shapiro Counsel for Petitioners

Application granted. Respondent's opposition and Reficar's cross-petition to confirm are due no later than August 4, 2023. Petitioner's reply, if any, and any opposition to the cross-petition to confirm are due no later than August 31, 2023. Reficar's reply in support of the cross-petition to confirm is due no later than September 22, 2023.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 32.

SO ORDERED.

Dated: July 24, 2023 New York, New York

GREGORY H. WOODS United States District Judge